

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:)	
)	BANKRUPTCY NO. 21-22274-GLT
TODD A. REPPERT)	
d/b/a REPPERT APPLIANCE AND)	CHAPTER 7
FURNITURE)	
)	DOCUMENT NO.
DEBTOR)	
*****)	
TODD A. REPPERT)	
d/b/a REPPERT APPLIANCE AND)	HEARING DATE: 3/31/22 @10:00 AM
FURNITURE)	
MOVANT)	
)	
NO RESPONDENT)	

**TRUSTEE'S RESPONSE TO DEBTOR'S MOTION TO CONVERT CASE TO CHAPTER 13
OR ALTERNATIVELY DISMISS CHAPTER 7 CASE**

AND NOW, comes Robert H. Slone, Trustee in the above captioned Chapter 7 proceeding, by and through his attorneys, Mahady and Mahady—Robert H. Slone, Esquire, and files this Response to the Debtor's Motion to Convert Case to Chapter 13 or Alternatively Dismiss Chapter 7 Case, avers as follows:

1. The Debtor commenced this case by the filing of a voluntary Chapter 11 petition for relief under the U.S. Bankruptcy Code on October 19, 2021. This case was converted to Chapter 7 by Court Order dated February 4, 2022 docketed at case no. 68.
2. Movant is the duly appointed Trustee in the above captioned case and is so acting.
3. The Trustee has visited the premises of Reppert Furniture and Appliances located at 414 Broad Street, Belle Vernon, PA on several occasions and finds as follows:
 - a. There is inventory and equipment located on the premises of Reppert Furniture and Appliances which are of potential value to the estate. There seems to be no lien against any of these assets.

- b. The Trustee was accompanied by Mark Ferry of Mark Ferry Auctioneers on his second visit to the premises to view the assets for the purposes of preparing an appraisal of the assets' value. Mark Ferry Auctioneers prepared an Inventory and Appraisal dated February 28, 2022, approximating the value of the assets to be between \$30,000.00 and \$40,000.00 and listing the costs of sale. A copy of the Inventory and Appraisal is attached hereto and made a part hereof as Exhibit "A".
- 4. The Debtor and his wife own real property located at 715 Fayette Avenue, Belle Vernon, PA 15012. The Debtor's wife, Laura L. Reppert, is currently in a Chapter 13 bankruptcy which was filed on February 21, 2017 at Case No. 17-20639-GLT. The Trustee finds as follows:
 - a. In her bankruptcy, Laura L. Reppert listed the value of the real property located at 715 Fayette Avenue, Belle Vernon, PA on Schedule A at \$140,000.00.
 - b. The Debtor amended his schedules at Docket No. 82 on February 18, 2022 to list the value of the real property located at 715 Fayette Avenue, Belle Vernon, PA at \$133,590.00.
 - c. The homeowner's policy covering the real property located at 715 Fayette Avenue is in the amount of \$369,887.00. A copy of said policy is attached hereto and made a part hereof as Exhibit "B".
 - d. The Trustee contacted a realtor, Stefani Lucas, of Realty One Group Gold Standard, to obtain a value of the property located at 715 Fayette Avenue. The Realtor approximated the property to be in the \$225,000.00 range, assuming that the property is in average condition with no major deficiencies.
 - e. The property located at 715 Fayette Avenue is encumbered by a mortgage of Valley First Community Federal Credit Union. The approximate amount owing on said mortgage as of February 7, 2022 was \$44,237.48. The Debtor's wife Laura L. Reppert, took an exemption in the 715 Fayette Avenue property in the amount of \$23,675.00, and the Debtor took an exemption in said real estate in the amount of \$25,150.00.

f. The Trustee asserts that there is equity in the real estate located at 715 Fayette Avenue at this time.

5. The United States Trustee's Office, by Larry Wahlquist, trial attorney, issued a 707(b) letter to the Debtor asking for additional information regarding possible other assets in this case.

WHEREFORE, the Chapter 7 Trustee respectfully represents that there is equity in the assets of this case that can and should be used to pay creditors in this case.

Respectfully submitted,

Dated: March 4, 2022

/s/ ROBERT H. SLONE
Robert H. Slone, Trustee
MAHADY & MAHADY
223 South Maple Avenue
Greensburg, PA 15601
Ph #(724) 834-2990
PA I.D. No. 19963
E-mail: robertslone223@gmail.com

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**CERTIFICATE OF SERVICE FOR TRUSTEE'S RESPONSE TO DEBTOR'S MOTION TO CONVERT CASE
TO CHAPTER 13 OR ALTERNATIVELY DISMISS CHAPTER 7 CASE**

I certify under penalty of perjury that I served the above captioned pleading(s) on the parties at the addresses specified below on March 4, 2022, by the following:

By First Class U.S. Mail:

U.S. Trustee's Office
Liberty Center, Suite 970
1001 Liberty Avenue
Pittsburgh, PA 15222

Dennis J. Spyra, Esquire
1711 Lincoln Way
White Oak, PA 15131

Todd A. Reppert
715 Fayette Avenue
Belle Vernon, PA 15012

EXECUTED ON: March 4, 2022

By: /s/ ROBERT H. SLONE
Robert H. Slone, Trustee
MAHADY & MAHADY
223 South Maple Avenue
Greensburg, PA 15601
(724) 834-2990
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